

EXHIBIT 14

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 16-2738

THIS DOCUMENT RELATES TO (FLW) (LHG)
ALL CASES
MDL Docket No. 2738

Friday, January 11, 2019

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The video deposition of SHAWN LEVY, Ph.D.,
taken pursuant to notice, was held at the
Embassy Suites Huntsville, 850 Monroe Street
S.W., Huntsville, Alabama, commencing at
approximately 9:04 a.m., on the above date,
before Lois Anne Robinson, Registered Diplomat
Reporter, Certified Realtime Reporter, and
Notary Public for the State of Alabama.

1 Q Have any of those projects attempted to
2 research the potential causes of ovarian cancer?

3 A Again, I'd have -- I'd have to review
4 the projects. They're certainly --
5 fundamentally, most of the questions regarding
6 the analysis of cancer samples are routinely to
7 investigate their cause or their treatment. So I
8 would -- I would answer that question as highly
9 likely.

10 Q Would you agree the cause of ovarian
11 cancer remains unknown today?

12 MS. O'DELL:

13 Object to the form.

14 A No, I would -- I would -- I would not
15 agree that it -- I would not agree to that
16 general statement.

17 MS. BROWN:

18 Q What are the causes of ovarian cancer
19 in your mind, Doctor?

20 A Well, the -- the causes of -- of
21 a -- of any number of cancers, including ovarian
22 cancer, are probably more well understood now
23 than ever, and their complexities I think now are
24 just beginning to be appreciated in the sense

1 that cancer is a disease of unregulated cell
2 growth.

3 Back to our earlier con- -- earlier
4 conversation, some of the fundamental facts that
5 we had discussed and, in fact, I think well
6 replicated in a number of sources, as you pointed
7 out to me, you know, illustrate that there's a
8 milieu of genetic change leading to cellular
9 transformation, and that cellular damage, if we
10 consolidate that as cellular damage, then has to
11 work in concert with a number of other events
12 providing the right environment for a tumor to
13 grow, such as inflammation, chronic or acute.
14 And, so, the -- you know, the -- the -- you know,
15 giving a singular cause would be inappropriate.

16 But I would say the mechanistic causes
17 of cancer are reasonably well understood, but how
18 those apply to the wide diversity of cancer types
19 remains an area of active investigation.

20 I think what's interesting on cancer in
21 general is that there's no -- really no longer a
22 bucket diagnosis. It is -- it -- lung cancer is
23 more complex than lung cancer and ovarian cancer,
24 certainly with the --

1 As I'm sure you're well aware, with the
2 molecular subtypes and other things, it's a
3 complicated disease as well.

4 So to summarize that is -- to summarize
5 all of that complexity by saying that the cause
6 is known or unknown I think would vastly
7 underestimate the -- our current state of the art
8 or knowledge of how complex cancer is as a
9 condition.

10 Q Sure.

11 Scientists, researchers, public health
12 authorities continue to investigate the mechanism
13 by which ovarian cancer is caused. Correct?

14 A That's correct.

15 Q We do not, sitting here today in 2019,
16 have a complete understanding of the etiology of
17 ovarian cancer. Correct?

18 MS. O'DELL:

19 Object to the form.

20 A I would say we have substantial
21 knowledge of factors and exposures that either
22 predispose or directly cause cancer in a large
23 number of -- large number of cancer areas,
24 including ovarian cancer.

1 Now, the -- whether that represents the
2 complete milieu of possibilities is -- is what is
3 currently under research.

4 MS. BROWN:

5 Q Were you aware that the University of
6 Alabama Comprehensive Cancer Center is an NCI
7 center, National Cancer Institute?

8 A Yes. It's -- it's not only an
9 NCI-designated center; it's an NCI-designated
10 comprehensive cancer center, which is a slightly
11 different classification. It's a -- there's more
12 criteria for a cancer center to meet to become
13 comprehensive.

14 Q What does it mean to be an NCI center,
15 to you, if you know?

16 A Stated very simply, it means you have
17 a -- your cancer center is funded by a support
18 grant directly from the National Cancer Institute
19 to provide -- that supports not only patient care
20 but also supports basic research, epidemiology
21 and -- and health outcomes research in cancer.

22 So, in a nutshell, it is a fairly
23 comprehensive grant that supports a wide variety
24 of work within a cancer center that extends